



State Of Ohio Environmental Protection Agency

Southwest District Office  
7 East Fourth Street; Dayton, Ohio 45402-2086

(513) 449-6357

US EPA RECORDS CENTER REGION 5



464417



Richard F. Celeste, Governor

February 20, 1986

Re: HOBART BROTHERS COMPANY  
MIAMI COUNTY  
HAZARDOUS WASTE  
OHD 004279337  
G

Mr. Bob Lamme  
Hobart Brothers Company  
600 West Main Street  
Troy, OH 45373

Dear Mr. Lamme:

On February 13, 1986, I met with you to determine the status and compliance of the Hobart Brothers Company with State and Federal Hazardous Waste Regulations. At that time, inspections of the Hobart Brothers' Welder Division at 600 West Main Street and the Hobart Brothers' Filler Metal/Power System Division at 101 Trade Square East (Troy) were conducted. The completed RCRA Interim Status Inspection forms are enclosed for your information.

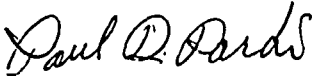
The findings of these inspections are as follows:

1. Both facilities were determined to be large generators of hazardous waste, subject to applicable regulations outlined in Ohio Administrative Code (OAC) Rules 3745-52 and 3745-65 (Code of Federal Regulations, Title 40, Sections 262 and 265). My February 24, 1986 letter to Mr. Joe Spahr of your company, which states that the Hobart Brothers Company is a small quantity generator, is no longer accurate.
2. It was found that the same generator identification number is being used on manifests from both facilities. This number (OHD 004279337) was issued to the 600 West Main Street facility (Welder Division) and is site specific. You must apply for another generator identification number for the Filler Metal/Power System Division. I have enclosed a notification form which you must complete for this facility. Submit the notification form to the USEPA, Region V Office in Chicago, and they will issue another generator identification number.
3. Neither facility currently maintains a documented personnel training program as required by OAC Rule 3745-65-16 (40 CFR 265.16). Please develop a personnel training plan for each facility and submit a copy of each to me for review no later than March 31, 1986. Do not conduct the actual training until I have a chance to review and comment on the programs. I have enclosed the RCRA Personnel Training Review Checklist which you may use as guidance.

4. Neither facility currently maintains a hazardous waste Contingency Plan as required by OAC Rule 3745-65-50 (40 CFR 265.50). Please develop Contingency Plans consistent with the regulations and submit copies for my review no later than March 31, 1986. After I have reviewed the plans and have deemed them adequate, you must submit a copy of each to all local emergency service agencies that might respond to an emergency at these facilities. I have enclosed the RCRA Contingency Plan Review Checklist for your assistance.
5. The drums of hazardous waste at both facilities are currently being stored with a DOT hazardous waste label attached. However, the accumulation start date is not being marked on each drum as required by OAC Rule 3745-52-34 (40 CFR 262.34). Immediately begin marking the start date of waste accumulation on each drum of hazardous waste. The drum must not be stored on site for more than 90 days from this date.
6. Weekly inspections of the drum storage areas at both facilities are not being conducted. This violates OAC Rule 3745-65-74 (40 CFR 265.174). You must immediately begin conducting weekly inspections of these storage areas and these inspections must be documented.
7. A review of your manifests from the two facilities showed that in some cases, the EPA hazardous number was not always included for the hazardous wastes described on the manifests. It is a requirement in the State of Ohio to include the hazardous waste number for each waste listed. It is the generator's responsibility to accurately complete the manifest.
8. You did not have a copy of Ohio's Hazardous Waste Rules at your facility. It would be beneficial to have a copy on hand for reference. You can order a copy of these rules by calling Ms. Ethyl Norman of our Columbus Office at (614) 466-6037.

I will conduct a reinspection of these facilities in the very near future to ensure that the drums are being labelled properly and that weekly inspections are being conducted and documented. If there are any questions or comments, please call me at (513) 449-6357.

Sincerely,



Paul D. Pardi  
Solid & Hazardous Waste Management Unit

PDP/1a1

cc: Mr. Kevin O'Grady, DSHWM/CO

2/13/86 9:30 AM  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

GENERAL INFORMATION

U.S. EPA I.D. # OHD

Facility: HOGART BROTHERS Co. / Welder Div. Address: 600 W. MAIN ST. City: TROY  
State: OHIO Zip Code: 45 County: MIAMI Telephone: 339-6600

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>BOB LAMME</u>		<u>339-6000 ext. 4517</u>
2.			
3.			

INSPECTOR(S)

1.	<u>PAUL PAROI</u>	<u>HWI/EEZ</u>	<u>513-449-6357</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- |  |  |   |
|--|--|---|
| <input checked="" type="checkbox"/> Generator only (G) | <input type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03                  |
| <input type="checkbox"/> Transporter (T)               |  | <input type="checkbox"/> Land Treatment D81               |
| <input type="checkbox"/> TSDF only                     | <input type="checkbox"/> Containers S01  | <input type="checkbox"/> Landfills D80                    |
| <input type="checkbox"/> G-T                           | <input type="checkbox"/> Tanks S02/T01   | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> G-TSDF                        | <input type="checkbox"/> Surface Impoundments S04/T02  | <input type="checkbox"/> Groundwater Monitoring           |
| <input type="checkbox"/> T-TSDF                        | <input type="checkbox"/> Incineration/Thermal Treatment  | <input type="checkbox"/> Post-Closure                     |
| <input type="checkbox"/> G-T-TSDF                      |  |   |

FOIA0338

# RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?
4. Was advance notice of the inspection given? If so, how far in advance?

Yes - No N/A Remark #

— X — —  
— — X — —  
— X — —  
X — — 3 DAYS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

## REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Facility generates - Paint sludge - D001  
- waste thinner - F001  
- Stripper - D002

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#1
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

#1. EPA Hazardous Waste Number was not included for all hazardous wastes described on manifests.  
GENERATOR - 1

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>See #7(h)</u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
  - a) Internal alarm system.
  - b) Access to telephone, radio or other device for summoning emergency assistance.
  - c) Portable fire control equipment.
  - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#1.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	"
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	"
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	"
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	"
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

#1. These items will be discussed during reinspection.



## RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
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### Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident.
  - b) Arrangements or agreements with local or state emergency authorities.
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
  - d) A list of all emergency equipment including location, physical description and outline of capabilities.
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
b) In good physical condition (265.171) [3745-66-71]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>